

**FORM 10**  
**APPLICATION FOR ACCESS TO INFORMATION UNDER**  
**PROTECTIVE ORDER BY EXPERT CONSULTANT OR WITNESS**

**United States Court of Federal Claims**

Amazon Web Services	)	
	)	
	)	
Plaintiff,	)	No. <u>1:19-cv-01796-PEC</u>
	)	
v.	)	Judge <u>Smith</u>
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	

APPLICATION FOR ACCESS TO INFORMATION UNDER  
PROTECTIVE ORDER BY EXPERT CONSULTANT OR WITNESS

1. I, the undersigned, am a Independent Consultant with Self and hereby apply for access to protected information covered by the Protective Order issued in connection with this proceeding.

2. I have been retained by Microsoft Corp. / Rogers Joseph O'donnell PC and will, under the direction and control of Robert Metzger, assist in the representation of Microsoft Corp. in this proceeding.

3. I hereby certify that I am not involved in competitive decision making as discussed in *U.S. Steel Corp. v. United States*, 730 F.2d 1465 (Fed. Cir. 1984), for or on behalf of any party to this proceeding or any other firm that might gain a competitive advantage from access to the information disclosed under the protective order. Neither I nor my employer provides advice or participates in any decisions of such parties in matters involving similar or corresponding information about a competitor. This means, for example, that neither I nor my employer provides advice concerning, or participates in decisions about, marketing or advertising strategies, product research and development, product design or competitive structuring and composition of bids, offers, or proposals with respect to which the use of protected information could provide a competitive advantage.

4. My professional relationship with the party for whom I am retained in this proceeding and its personnel is strictly as a consultant on issues relevant to the proceeding. Neither I nor any member of my immediate family holds office or a management position in any company that is a party in this proceeding or in any competitor or potential competitor of a party.

5. I have attached the following information:

- a. a current resume describing my education and employment experience to date;
- b. a list of all clients for whom I have performed work within the two years prior to the date of this application and a brief description of the work performed;
- c. a statement of the services I am expected to perform in connection with this proceeding;

- d. a description of the financial interests that I, my spouse, and/or my family has in any entity that is an interested party in this proceeding or whose protected information will be reviewed; if none, I have so stated;
- e. a list identifying by name of forum, case number, date, and circumstances all instances in which I have been granted admission or been denied admission to a protective order, had a protective order admission revoked, or have been found to have violated a protective order issued by an administrative or judicial tribunal; if none, I have so stated; and
- f. a list of the professional associations to which I belong, including my identification numbers.

6. I have read a copy of the Protective Order issued by the court in this proceeding. I will comply in all respects with all terms and conditions of that order in handling any protected information produced in connection with the proceeding. I will not disclose any protected information to any individual who has not been admitted under the Protective Order by the court.


7. For a period of two years after the date this application is granted, I will not engage or assist in the preparation of a proposal to be submitted to any agency of the United States government for enterprise infrastructure cloud when I know or have reason to know that any party to this proceeding, or any successor entity, will be a competitor, subcontractor, or teaming member.

8. For a period of two years after the date this application is granted, I will not engage or assist in the preparation of a proposal or submission to Washington Headquarters Service nor will I have any personal involvement in any such activity.

9. I acknowledge that a violation of the terms of the Protective Order may result in the imposition of such sanctions as may be deemed appropriate by the court and in possible civil and criminal liability.

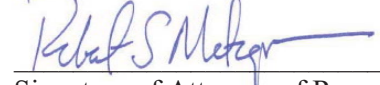
\* \* \*

By my signature, I certify that, to the best of my knowledge, the representations set forth above (including attached statements) are true and correct.

  
\_\_\_\_\_  
Signature  
Jeff Tang, Consultant

\_\_\_\_\_  
Typed Name and Title  
(661) 487-0719  
\_\_\_\_\_  
Telephone Number  
thejefftang@gmail.com

\_\_\_\_\_  
E-mail Address

  
\_\_\_\_\_  
Signature of Attorney of Record  
Robert S. Metzger

\_\_\_\_\_  
Typed Name and Title  
202-777-8951  
\_\_\_\_\_  
Telephone Number  
rmetzger@rjo.com  
\_\_\_\_\_  
E-mail Address

\_\_\_\_\_  
December 23, 2019  
Date Executed

\_\_\_\_\_  
December 23, 2019  
Date Executed

**UNITED STATES COURT OF FEDERAL CLAIMS  
JEDI BID PROTEST  
CONSULTANT PROTECTIVE ORDER APPLICATION  
RESPONSE TO REQUEST FOR INFORMATION  
JEFF TANG  
DECEMBER 23, 2019**

**Response to Request for Information 5(a) (see attached resume)**

**Response to Request for Information 5(b)**

I have not performed work for clients within the two years prior to the date of this application.

**Response to Request for Information 5(c)**

Counsel for Microsoft has retained me to review relevant documents and to analyze proposals and selection criteria. If requested, I may prepare a declaration, report, and/or testimony related to my analysis.

**Response to Request for Information 5(d)**

I, my spouse, and my family do not hold financial interests in any entity that is an interested party in this protest or whose protected material will be reviewed.

**Response to Request for Information 5(e)**

I have not: 1) been granted admission to a protective order; 2) had admission to a protective order denied; 3) had a protective order admission revoked; or 4) been found to have violated a protective order issued by an administrative or judicial tribunal.

**Response to Request for Information 5(f)**

I am not a member of any professional associations.

# Jeffrey Tang

☎ (661) 487-0719 | ✉ jeff@mischief.industries | 📄 mrjefftang | 🌐 mrjefftang | 🐦 @mrjefftang

## Experience

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### Blackberry Cylance

Arlington, VA

SENIOR MANAGER OF APPLIED RESEARCH

July 2016 - Present

- Lead a distributed team of researchers to develop effective anti-exploitation capabilities for Windows, macOS, and Linux to protect customers from zero-day exploits
- Architected a fully undetectable malware mutation platform to evade antivirus engines to demonstrate competitor weaknesses and validate machine learning efficacy
- Researched and developed new techniques for bypassing anti-exploitation mitigations in security software and evading next-gen endpoint detection and response (EDR) software
- Provided expert analysis and commentary of new vulnerabilities and security incidents for customers, information security journalists, and marketing efforts

### VAHNA

Washington, D.C.

CO-FOUNDER & CHIEF SCIENTIST

Mar 2013 - Jun 2016

- Designed and developed the core security platform using the Agile development model to generate \$1MM of revenue within 12 months of the founding of the company
- Built a cross-platform (Windows, Mac OS X, Linux) host agent to establish secure network communications, gather telemetry information, and perform remediation tasking
- Architected a cloud based data pipeline for ingesting and analyzing large volumes of telemetry data to correlate and identify malicious activity in near real-time
- Performed penetration testing/vulnerability assessment for clients to discover network vulnerabilities, determine intrusion vectors, and recommend corrective actions
- Conducted an incident response investigation to identify a foreign intelligence actor exfiltrating sensitive data and assisted the FBI with the corresponding investigation
- Developed and instructed a variety of beginner to expert level cybersecurity training classes: *Advanced Penetration Testing, Assembly for Reverse Engineers, Hacking with Python, Basic Malware Analysis*

### Mantech International

Vienna, VA

CNO DEVELOPER

Oct 2011 - Mar 2013

- Researched tools, techniques, countermeasures, and trends in computer network vulnerabilities, data hiding, network security, and encryption
- Collaborated with clients and stakeholders to obtain detailed product requirements
- Provided onsite support and developed resolutions for problems affecting live operations
- Developed automation for examining file information across a library of hundreds of virtual machines and retrieved recently modified files of interest

### National Security Agency

NSA/CSS Hawaii

GLOBAL NETWORK EXPLOITATION & VULNERABILITY ANALYST

Jan 2009 - Sept 2011

- Conducted computer network exploitation operations to enable and collect foreign intelligence in support of national security requirements including computer network operations (CNO) related military targeting support and U.S. Government computer network attack efforts
- Engineered a web application to enable and track shared resources across the global enterprise and provide accounting logs/usage metrics
- Detected malware through memory and file system forensics and identified capabilities
- Served as a subject matter expert in computer network exploitation tools and techniques and provided computer network operations training to teammates
- Created a technical assessment for potential hires to gauge technical proficiency in operating systems, computer networks, and programming
- Wrote numerous scripts to automate processes and streamline operations to reduce the number of hours spent per day on routine procedures

## Education

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### University of Virginia - Darden School of Business

Arlington, VA

MASTER OF BUSINESS ADMINISTRATION

Aug 2019 - May 2021

### Eastern Michigan University

Ypsilanti, MI

MASTER OF SCIENCE IN OFFENSIVE COMPUTER SECURITY

Jun 2010 - Apr 2012

### University of California, Berkeley

Berkeley, CA

BACHELOR OF SCIENCE IN ELECTRICAL ENGINEERING & COMPUTER SCIENCE

Aug 2005 - Dec 2008